

**BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

**In the Matter of the Accusation)
Against:)**

Nathaniel Rohde Woodruff, M.D.)

File No. 800-2016-028916

**Physician's and Surgeon's)
Certificate No. C 55840)**

Respondent)

DECISION AND ORDER

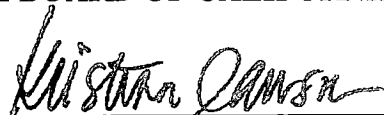
The attached Stipulated Settlement and Disciplinary Order for Public Reprimand is hereby adopted as the Decision and Order of the Medical Board of California, Department of Consumer Affairs, State of California.

This Decision shall become effective at 5:00 p.m. on February 21, 2018.

IT IS SO ORDERED January 22, 2018.

MEDICAL BOARD OF CALIFORNIA

By:


**Kristina D. Lawson, M.D., Chair
Panel B**

1 XAVIER BECERRA
Attorney General of California
2 JANE ZACK SIMON
Supervising Deputy Attorney General
3 KEITH C. SHAW
Deputy Attorney General
4 State Bar No. 227029
455 Golden Gate Avenue, Suite 11000
5 San Francisco, CA 94102-7004
Telephone: (415) 703-5385
6 Facsimile: (415) 703-5480
Attorneys for Complainant
7

8 **BEFORE THE**
MEDICAL BOARD OF CALIFORNIA
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. 800-2016-028916

12 **NATHANIEL ROHDE WOODRUFF, M.D.**

13 P.O. Box 451
14 Gladwin, MI 48624

15 **Physician's and Surgeon's Certificate No. C**
55840

16 Respondent.
17

STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER FOR PUBLIC
REPRIMAND

18
19 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
20 entitled proceedings that the following matters are true:

21 PARTIES

22 1. Kimberly Kirchmeyer (Complainant) is the Executive Director of the Medical Board
23 of California (Board). She brought this action solely in her official capacity and is represented in
24 this matter by Xavier Becerra, Attorney General of the State of California, by Keith C. Shaw,
25 Deputy Attorney General.

26 2. Respondent Nathaniel Rohde Woodruff, M.D. (Respondent) enters into this
27 Stipulated Settlement and Disciplinary Order for Public Reprimand in consultation with his
28

1 Michigan legal counsel, David L. Rogers, Esq., whose address is: 32255 Northwestern Highway,
2 Suite 190, Farmington Hills, MI 48334.

3 3. On or about March 22, 2013, the Board issued Physician's and Surgeon's Certificate
4 No. C 55840 to Nathaniel Rohde Woodruff, M.D. The Physician's and Surgeon's Certificate was
5 in full force and effect at all times relevant to the charges brought in Accusation No. 800-2016-
6 028916, and will expire on September 30, 2018, unless renewed.

7 JURISDICTION

8 4. Accusation No. 800-2016-028916 was filed before the Medical Board of California,
9 Department of Consumer Affairs, and is currently pending against Respondent. The Accusation
10 and all other statutorily required documents were properly served on Respondent on August 14,
11 2017. Respondent filed his Notice of Defense in response to the Accusation. A copy of
12 Accusation No. 800-2016-028916 is attached as exhibit A and incorporated herein by reference.

13 ADVISEMENT AND WAIVERS

14 5. Respondent has carefully read, fully discussed with Michigan legal counsel, and
15 understands the charges and allegations in Accusation No. 800-2016-028916. Respondent has
16 also carefully read, fully discussed with counsel, and understands the effects of this Stipulated
17 Settlement and Disciplinary Order for Public Reprimand.

18 6. Respondent is fully aware of his legal rights in this matter, including the right to a
19 hearing on the charges and allegations in the Accusation; the right to confront and cross-examine
20 the witnesses against him; the right to present evidence and to testify on his own behalf; the right
21 to the issuance of subpoenas to compel the attendance of witnesses and the production of
22 documents; the right to reconsideration and court review of an adverse decision; and all other
23 rights accorded by the California Administrative Procedure Act and other applicable laws.

24 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
25 every right set forth above.

26 ///

27 ///

28 ///

1 CULPABILITY

2 8. Respondent understands and agrees that the charges and allegations in Accusation
3 No. 800-2016-028916, if proven at a hearing, constitute cause for imposing discipline upon his
4 Physician's and Surgeon's Certificate.

5 9. For the purpose of resolving the Accusation without the expense and uncertainty of
6 further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual
7 basis for the charges in the Accusation, and that Respondent hereby gives up his right to contest
8 those charges.

9 10. Respondent agrees that his Physician's and Surgeon's Certificate is subject to
10 discipline and he agrees to be bound by the Board's terms as set forth in the Disciplinary Order
11 below.

12 CONTINGENCY

13 11. This stipulation shall be subject to approval by the Board. Respondent understands
14 and agrees that counsel for Complainant and the staff of the Board may communicate directly
15 with the Board regarding this stipulation and settlement, without notice to or participation by
16 Respondent or his Michigan legal counsel. By signing the stipulation, Respondent understands
17 and agrees that he may not withdraw his agreement or seek to rescind the stipulation prior to the
18 time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its
19 Decision and Order, the Stipulated Settlement and Disciplinary Order for Public Reprimand shall
20 be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action
21 between the parties, and the Board shall not be disqualified from further action by having
22 considered this matter.

23 12. The parties understand and agree that Portable Document Format (PDF) and facsimile
24 copies of this Stipulated Settlement and Disciplinary Order for Public Reprimand, including PDF
25 and facsimile signatures thereto, shall have the same force and effect as the originals.

26 13. In consideration of the foregoing admissions and stipulations, the parties agree that
27 the Board may, without further notice or formal proceeding, issue and enter the following
28 Disciplinary Order:

DISCIPLINARY ORDER

A. PUBLIC REPRIMAND

IT IS HEREBY ORDERED that Respondent Nathaniel Rohde Woodruff, M.D., Physician's and Surgeon's Certificate No. C 55840, shall be and hereby is publicly reprimanded pursuant to California Business and Professions Code section 2227, subdivision (a)(4). This public reprimand is issued in connection with the Michigan Board of Medicine's Consent Order and Stipulation, issued to resolve allegations that Respondent failed to properly document a prescription in a patient chart and failed to properly obtain Michigan Automated Prescription System reports. Based on these findings, Respondent was required to pay a fine in the amount of \$15,000, as set forth in Accusation No. 800-2016-028916.

B. PROFESSIONALISM PROGRAM (ETHICS COURSE)

Within 60 calendar days of the effective date of this Decision, Respondent shall enroll in a professionalism program, that meets the requirements of Title 16, California Code of Regulations (CCR) section 1358.1. Respondent shall participate in and successfully complete that program. Respondent shall provide any information and documents that the program may deem pertinent. Respondent shall successfully complete the classroom component of the program not later than six (6) months after Respondent's initial enrollment, and the longitudinal component of the program not later than the time specified by the program, but no later than one (1) year after attending the classroom component. The professionalism program shall be at Respondent's expense and shall be in addition to the Continuing Medical Education (CME) requirements for renewal of licensure.

A professionalism program taken after the acts that gave rise to the charges in the Accusation, but prior to the effective date of the Decision may, in the sole discretion of the Board or its designee, be accepted towards the fulfillment of this condition if the program would have been approved by the Board or its designee had the program been taken after the effective date of this Decision.

Respondent shall submit a certification of successful completion to the Board or its designee not later than 15 calendar days after successfully completing the program or not later

1 than 15 calendar days after the effective date of the Decision, whichever is later.

2 If Respondent fails to enroll, participate in, or successfully complete the professionalism
3 program within the designated time period, Respondent shall receive a notification from the
4 Board or its designee to cease the practice of medicine within three (3) calendar days after being
5 so notified. Respondent shall not resume the practice of medicine until he has completed the
6 professionalism program. Failure to enroll, participate in, or successfully complete the
7 professionalism program within the designated time period shall constitute unprofessional
8 conduct and grounds for further disciplinary action.

9 ACCEPTANCE

10 I have carefully read the above Stipulated Settlement and Disciplinary Order for Public
11 Reprimand. I understand the stipulation and the effect it will have on my Physician's and
12 Surgeon's Certificate. I enter into this Stipulated Settlement and Disciplinary Order for Public
13 Reprimand voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and
14 Order of the Medical Board of California.

15
16 DATED: 8 Dec 2017



NATHANIEL ROHDE WOODRUFF, M.D.
Respondent

18 I have read and fully discussed with Respondent Nathaniel Rohde Woodruff, M.D. the
19 terms and conditions and other matters contained in the above Stipulated Settlement and
20 Disciplinary Order. I approve its form and content.

21
22 DATED: DEC 12, 2017



DAVID L. ROGERS, ESQ
Attorney for Respondent

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Medical Board of California.

Dated: December 12, 2017

Respectfully submitted,

XAVIER BECERRA
Attorney General of California
JANE ZACK SIMON
Supervising Deputy Attorney General



KEITH C. SHAW
Deputy Attorney General
Attorneys for Complainant

SF2017203771
33163891.doc

Exhibit A

Accusation No. 800-2016-028916

XAVIER BECERRA
Attorney General of California
JANE ZACK SIMON
Supervising Deputy Attorney General
KEITH C. SHAW
Deputy Attorney General
State Bar No. 227029
455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102-7004
Telephone: (415) 703-5385
Facsimile: (415) 703-5480
Attorneys for Complainant

BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

Case No. 800-2016-028916

Nathaniel Rohde Woodruff, M.D.

A C C U S A T I O N

P.O. Box 451
Gladwin, MI 48624

**Physician's and Surgeon's Certificate
No. C 55840,**

Respondent.

Complainant alleges:

PARTIES

1. Kimberly Kirchmeyer (Complainant) brings this Accusation solely in her official capacity as the Executive Director of the Medical Board of California (Board).
2. On or about March 22, 2013, the Medical Board issued Physician's and Surgeon's Certificate Number C 55840 to Nathaniel Rohde Woodruff, M.D. (Respondent). The Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought herein and will expire on September 30, 2018, unless renewed.

JURISDICTION

3. This Accusation is brought before the Board, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

A. Section 2227 of the Code provides in part that the Board may revoke,

1 suspend for a period not to exceed one year, or place on probation, the license of any
2 licensee who has been found guilty under the Medical Practice Act, and may recover the
3 costs of probation monitoring.

4 B. Section 2305 of the Code provides, in part, that the revocation, suspension,
5 or other discipline, restriction, or limitation imposed by another state upon a license or
6 certificate to practice medicine issued by that state, or the revocation, suspension, or
7 restriction of the authority to practice medicine by any agency of the federal government,
8 that would have been grounds for discipline in California of a licensee under this chapter,
9 shall constitute grounds for disciplinary action for unprofessional conduct against the
10 licensee in this state.

11 C. Section 141 of the Code provides:

12 “(a) For any licensee holding a license issued by a board under the jurisdiction of
13 the department, a disciplinary action taken by another state, by any agency of the
14 federal government, or by another country for any act substantially related to the
15 practice regulated by the California license, may be a ground for disciplinary action
16 by the respective state licensing board. A certified copy of the record of the
disciplinary action taken against the licensee by another state, an agency of the
federal government, or another country shall be conclusive evidence of the events
related therein.

17 “(b) Nothing in this section shall preclude a board from applying a specific
18 statutory provision in the licensing act administered by that board that provides for
discipline based upon a disciplinary action taken against the licensee by another state,
an agency of the federal government, or another country.”

19 CAUSE FOR DISCIPLINE

20 **(Discipline, Restriction, or Limitation Imposed by Another State)**

21 4. On September 28, 2016, the Michigan Board of Medicine (Michigan Board) issued a
22 Consent Order and Stipulation (Order) regarding Respondent’s license to practice medicine in the
23 State of Michigan. The Order contains the following stipulated factual findings:

24 a. On July 11, 2013, Respondent wrote a prescription for Compazine¹ for his wife,
25 B.B., knowing that she intended to use the medication for B.B.’s son, J.S.

26 Respondent failed to properly document in a patient chart the prescription for B.B.

27 ¹ Compazine is an anti-psychotic drug used to treat psychotic disorders, anxiety, and control
28 severe nausea and vomiting. It is not a controlled substance.

- 1 b. On August 10, 2013, Respondent sent B.B. a letter discharging her from
2 Respondent's practice due to their marital separation.
- 3 c. On August 13, 2013, Respondent requested a report from the Michigan Automated
4 Prescription System (MAPS) regarding prescriptions written for and obtained by
5 B.B. In requesting the MAPS report, Respondent certified that B.B. was a current
6 patient and also indicated the reason for the request was "Patient requesting
7 narcotics by name."
- 8 d. On April 9, 2014, Respondent requested a MAPS report detailing prescriptions
9 written for and obtained by B.B. Respondent indicated the reason for the request
10 was "Patient claiming prescription was lost or stolen."
- 11 e. On August 9, 2014, Respondent requested a MAPS report for prescriptions written
12 for and obtained by B.B. Respondent specified the reason for the request was
13 "Patient exhibiting erratic behavior."

14 A true and correct copy of the Order issued by the Michigan Board is attached as Exhibit A.

15 5. Respondent's license to practice medicine in the State of Michigan is subject to the
16 following term pursuant to the Order: Respondent is fined \$15,000. Failure to pay the fine within
17 120 days of the effective date of the Order shall result in the suspension of Respondent's
18 Michigan medical license.

19 6. Respondent's conduct and the action of the Michigan Board, as set forth in
20 paragraphs 4 and 5 above, constitute cause for discipline pursuant to sections 2305 and/or 141 of
21 the Code.

22 **PRAYER**

23 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
24 and that following the hearing, the Board issue a decision:


25 1. Revoking or suspending Physician's and Surgeon's Certificate Number C 55840,
26 issued to Nathaniel Rohde Woodruff, M.D.;

27 2. Revoking, suspending or denying approval of Nathaniel Rohde Woodruff, M.D.'s
28 authority to supervise physician assistants and advanced practice nurses;

1 3. Ordering Nathaniel Rohde Woodruff, M.D., if placed on probation, to pay the Board
2 the costs of probation monitoring; and

3 4. Taking such other and further action as deemed necessary and proper.

4
5 DATED: August 14, 2017


KIMBERLY KIRCHMEYER
Executive Director
Medical Board of California
State of California
Complainant

6
7
8
9 SF2017203771
10 41799866.doc
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
BUREAU OF PROFESSIONAL LICENSING
BOARD OF MEDICINE
DISCIPLINARY SUBCOMMITTEE

In the Matter of

NATHANIEL ROHDE WOODRUFF, M.D.,
License No. 48-01-065098

Complaint No. 48-14-135817

CONSENT ORDER AND
STIPULATION

CONSENT ORDER

A superseding administrative complaint was filed with the Disciplinary Subcommittee of the Board of Medicine on July 26, 2016, charging Nathaniel Rohde Woodruff, M.D. (Respondent) with having violated sections 16621(a) and (h) and section 16231 of the Public Health Code, 1978 PA 368, as amended, MCL 333.1101 *et seq.*

The parties have stipulated that the Disciplinary Subcommittee may enter this consent order. The Disciplinary Subcommittee has reviewed the stipulation contained in this document and agrees that the public interest is best served by resolution of the outstanding superseding complaint. Therefore, the Disciplinary Subcommittee finds that the allegations of fact contained in the superseding complaint are true and that Respondent has violated sections 16621(a) and (h) and section 16231 of the Public Health Code.

Accordingly, for these violations, IT IS ORDERED:

Respondent is FINED \$15,000, to be paid by check, money order, or cashier's check made payable to the State of Michigan (with superseding complaint number

48-14-135817 clearly indicated on the check or money order) and shall be payable within 120 days of the effective date of this order.

The timely payment of the fine shall be Respondent's responsibility.

Respondent shall mail the fine to: Compliance Section, Bureau of Professional Licensing, Legal Affairs Division, Department of Licensing and Regulatory Affairs, P.O. Box 30189, Lansing, Michigan 48909. If Respondent fails to timely pay the fine, his license shall be suspended until payment is received. If Respondent's license remains suspended for longer than six months and one day, reinstatement is not automatic. If Respondent petitions for reinstatement of his license, the petition shall be in accordance with sections 16245 and 16247 of the Public Health Code and Mich Admin Code, R 792.10711. Under these provisions, Respondent must demonstrate the following by clear and convincing evidence: (1) good moral character; (2) the ability to practice the profession with reasonable skill and safety; (3) satisfaction of the guidelines on reinstatement adopted by the Department; and (4) that it is in the public interest for the license to be reinstated.

Respondent shall be responsible for the timely compliance with the terms of this consent order, including the timely filing of any documentation. Failure to comply within the time limitations provided will constitute a violation of this order.

If Respondent violates any term or condition set forth in this order, Respondent will be in violation of Mich Admin Code, R 338.1682, and section 16221(h) of the Public Health Code.

This order shall be effective 30 days from the date signed by the Chairperson of the Disciplinary Subcommittee or the Disciplinary Subcommittee's authorized representative, as set forth below.

Signed on 12-16-16

MICHIGAN BOARD OF MEDICINE

By 

Chairperson, Disciplinary Subcommittee

STIPULATION

The parties stipulate as follows:

1. Respondent does not contest the allegations of fact and law in the superseding complaint. Respondent understands that, by pleading no contest, he does not admit the truth of the allegations but agrees that the Disciplinary Subcommittee may treat the allegations as true for resolution of the superseding complaint and may enter an order treating the allegations as true.
2. Respondent understands and intends that, by signing this stipulation, he is waiving the right under the Public Health Code, rules promulgated under the Public Health Code, and the Administrative Procedures Act of 1969, 1969 PA 806, as amended, MCL 24.201 *et seq.*, to require the Department to prove the charges set forth in the superseding complaint by presentation of evidence and legal authority, and to present a defense to the charges before the Disciplinary Subcommittee or its

authorized representative. Should the Disciplinary Subcommittee reject the proposed consent order, the parties reserve the right to proceed to hearing.

3. The Disciplinary Subcommittee may enter the above consent order, supported by Board conferee Peter Graham, M.D. Dr. Graham or an attorney from the Licensing and Regulation Division may discuss this matter with the Disciplinary Subcommittee in order to recommend acceptance of this resolution.

4. Dr. Graham and the parties considered the following factors in reaching this agreement:

A. During the pendency of this disciplinary action, Respondent completed the following continuing education as approved by Dr. Graham: *Understanding the Code of Medical Ethics- Physician Wellness; Understanding the Code of Medical Ethics- Boundaries for Physicians; Risk Management Focus- Professional Boundaries; Ethics and Professional Boundaries in Healthcare; Challenges- Professional Boundaries and Patient Encounters; and Risk Management Essentials- Documentation*. These classes totaled 18.5 hours of continuing education.


B. While Respondent's behavior was troubling, it appears that his misconduct did not extend beyond his relationships with B.B. and J.S. and was not reflective of his overall practice of medicine.

C. Respondent fully cooperated with the investigation and resolution of this matter.

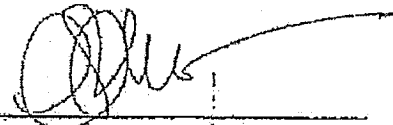
SIGNATURES ON NEXT PAGE

By signing this stipulation, the parties confirm that they have read,
understand, and agree with the terms of the consent order.


AGREED TO BY:


Andrew J. Hudson (P76092)
Assistant Attorney General
Attorney for Complainant
Dated: 9-28-16

AGREED TO BY:


Nathaniel Rohde Woodruff, M.D.
Respondent

Dated:


David Rogers (P84450)
Attorney for Respondent
Dated:

LF: 2016-0138907-A/Woodruff, Nathaniel Rohde, M.D., 135817/Order - Consent Order - 2016-07-15

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
BUREAU OF PROFESSIONAL LICENSING
BOARD OF MEDICINE
DISCIPLINARY SUBCOMMITTEE

In the Matter of

NATHANIEL ROHDE WOODRUFF, M.D.
License No. 43-01-065098

Complaint No. 43-14-135817

FIRST SUPERSEDING ADMINISTRATIVE COMPLAINT

Attorney General Bill Schuette, through Assistant Attorney General Andrew J. Hudson, on behalf of the Department of Licensing and Regulatory Affairs, Complainant herein, files the within First Superseding Administrative Complaint against Nathaniel Rohde Woodruff, M.D. (Respondent), alleging upon information and belief as follows:

1. The Michigan Board of Medicine (Board) is an administrative agency established by the Public Health Code, 1978 PA 368, as amended; MCL 333.1101 et seq.
2. Respondent is currently licensed to practice medicine in the state of Michigan and has a current controlled substance license.
3. Compazine is a prescription medication.
4. At all relevant times, Respondent was employed as a medical doctor at MidMichigan Cardiology, P.C. (facility) in Gladwin, Michigan and Midland, Michigan.

5. Section 16221(a) of the Code provides the disciplinary subcommittee with authority to take disciplinary action against Respondent for a violation of general duty, consisting of negligence or failure to exercise due care, including negligent delegation to, or supervision of employees or other individuals, whether or not injury results, or any conduct, practice, or condition which impairs, or may impair, the ability to safely and skillfully practice as a physician.

6. Section 16221(h) of the Code provides the disciplinary subcommittee with authority to take disciplinary action against Respondent for a violation, or aiding or abetting in a violation, of Article 15 or of a rule promulgated under Article 15.

7. Section 16231 of the Code requires an individual licensed under Article 15 to keep and maintain a record for each patient for whom he has provided medical services for a minimum of 7 years from the date of service to which the record pertains.

8. Section 16226 of the Code authorizes the disciplinary subcommittee to impose sanctions against persons licensed by the Board, if after opportunity for a hearing, the disciplinary subcommittee determines that a licensee violated one or more of the subdivisions contained in section 16221 of the Code.

FACTUAL ALLEGATIONS

9. On July 11, 2013, Respondent wrote Compazine prescription for B.B. (initials are used throughout to protect the individuals' identifies) knowing that B.B. intended to use the medication for B.B.'s son, J.S. B.B. and Respondent were

married at this time. Respondent failed to properly document in a patient chart the prescription he provided to B.B.

10. On August 10, 2013, Respondent sent B.B. a letter discharging B.B. from Respondent's practice due to their marital separation.

11. On August 13, 2013, Respondent used an online system to request a report from the Michigan Automated Prescription System (MAPS) about prescriptions written for and obtained by B.B. In requesting the MAPS report, Respondent certified that the information was "for the purpose of providing medical or pharmaceutical treatment to a bona fide current patient," as required by section 7333a(2)(f) of the Public Health Code, *supra*. Respondent also indicated that the reason for requesting the report was "Patient requesting narcotics by name."

12. On April 9, 2014, Respondent used an online system to request a report from the MAPS about prescriptions written for and obtained by B.B. Respondent indicated that the reason for requesting the report was "Patient claiming prescription was lost or stolen."

13. On August 9, 2014, Respondent used an online system five times to request a report from the MAPS about prescriptions written for and obtained by B.B. Respondent indicated that the reason for requesting the report was "Patient exhibiting erratic behavior."

COUNT I

14. Respondent's conduct as described above constitutes a violation of general duty, consisting of negligence or failure to exercise due care, in violation of section 16221(a) of the Code.

COUNT II

15. Respondent's conduct as described above constitutes a failure to maintain medical records contrary to section 16231 and in violation of section 16221(h) of the Code.

THEREFORE, Complainant requests that this Complaint be served upon Respondent.

RESPONDENT IS HEREBY NOTIFIED that, pursuant to section 16231(8) of the Public Health Code, Respondent has 30 days from the receipt of this Complaint to submit a written response to the allegations contained in it. The written response shall be submitted to the Bureau of Professional Licensing, Department of Licensing and Regulatory Affairs, P.O. Box 30670, Lansing, Michigan, 48909, with a copy to the undersigned assistant attorney general. Further, pursuant to section 16231(9), failure to submit a written response within 30 days shall be treated as an admission of the allegations contained in the complaint and shall result in the transmittal of the complaint directly to the Board's Disciplinary Subcommittee for imposition of an appropriate sanction.

FURTHER, the administrative complaint previously filed against Respondent on January 8, 2016 is hereby WITHDRAWN and replaced in full by this superseding complaint.

BILL SCHUETTE

Attorney General

By 

Andrew J. Hudson (P76092)

Assistant Attorney General

Licensing & Regulation Division

3RD Floor Williams Building

525 Ottawa Street

P.O. Box 30758

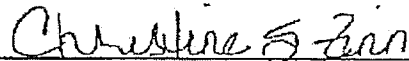
Lansing, MI 48933

Phone: 517-373-1146 Fax: 517-241-1997

Dated: July 26, 2016

PROOF OF SERVICE

The undersigned certifies that on the date indicated above, a copy of the foregoing document was served upon David Rogers, Attorney for Respondent, by emailing the same to his attention and to his email address of: DRogers@healthlex.com.



Christine S. Zinn